

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

APR 27 2015

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

David J. Bradley, Clerk

CRIMINAL COMPLAINT

Ivan Sanchez-Rodriguez **PRINCIPAL**
A208 164 338 YOB: 1978
United States Citizen

Case Number:

M-15- -M

0663

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 26, 2015 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact Juan Maldonado and Jorge Ely Gonzalez-Gonzalez, a nationals of the Mexican United States, along with two (2) other undocumented aliens, for a total of four (4), who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Rio Grande City, Texas to the point of arrest near Rio Grande City, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) **FELONY**
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On April 25, 2015, at approximately 11:20 P.M., Rio Grande City Border Patrol Agents operating surveillance tower, advised nearby agents of several subjects running to a pickup truck behind Lack's Furniture store in Rio Grande City, Texas. Tower operator advised agents that the subject were loading into a small two door pickup truck and was traveling north in the neighborhood towards the Lack's Furniture store.

Minutes later, the pickup truck was observed by Patrol Agent J. Perez turning east onto U.S. Highway 83 traveling at a slow rate of speed. Agent Perez was able to observe subjects lying down in the bed of the pickup truck. He then relayed the vehicle's color, make and model, a white Chevrolet S-10, to surrounding agent and Texas State Troopers.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by David A. Lindemann

P. A. J. 4/27/15

Sworn to before me and subscribed in my presence,

Signature of Complainant

Francisco J. Sanchez Senior Patrol Agent

Printed Name of Complainant

April 27, 2015
Date

3:50 PM at

McAllen, Texas
City and State

Peter E. Ormsby, U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

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CONTINUATION:

DPS Trooper Adam Lawson then was able to stop said vehicle on Bluebird Street. The driver, later identified as Ivan Sanchez Rodriguez, exited the vehicle with his hands in the air. Trooper Lawson and agents approached the pickup truck and observed two subjects lying in the bed of the pickup truck and immediately arrested Ivan Sanchez Rodriguez. An additional two subjects were inside the cabin of the pickup truck. The four passengers were questioned and all freely admitted to being present in the United States illegally. All subjects were transported to the Rio Grande City, Texas Border Patrol Station for processing.

PRINCIPAL:

Ivan Sanchez Rodriguez was advised of his rights, understood his rights and voluntarily stated that he was willing to give a sworn statement without the presence of a lawyer.

Ivan Sanchez Rodriguez, United States citizen, stated that a subject named Jesus "Chuy" approached him at the family dollar in Roma, Texas and offered to pay him \$80.00 U.S. Dollars for each illegal alien. Ivan Sanchez Rodriguez stated that his intentions were to go and pick up four illegal aliens and take them to Las Lomas neighborhood to drop them off near Mendoza's Meat Market. Rodriguez also stated that this was the second time he has transported illegal aliens and knew that what he did today was illegal. Ivan Sanchez Rodriguez further stated that he had been arrested before for transporting 450 pounds of marijuana.

MATERIAL WITNESSES:

Juan MALDONADO-Ramirez and Jorge Ely GONZALEZ-Gonzalez were advised of their Miranda Rights as per service form I-214 in the Spanish language both signed the form indicating that they understood their rights and were willing to provide a sworn statement without the presence of an attorney.

Juan MALDONADO-Ramirez, a citizen and national of Mexico, stated that he crossed the river illegally with three other subjects and the guide on an inflatable raft. Subject advised that the guide told them to walk north, cross a fence and then load into a white pickup truck which would be parked nearby. Maldonado claims that he was laying in the bed of the pickup truck with another subject. Juan MALDONADO-Ramirez positively identified, the driver of the white pickup truck as Ivan Sanchez Rodriguez.

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MATERIAL WITNESS 2:

Jorge Ely GONZALEZ-Gonzalez, a citizen and national of Mexico, stated that he made arrangements with an unknown smuggler in Camargo, Mexico was to pay \$3,000 USD to be smuggled into the United States. Gonzalez-Gonzalez stated that he crossed into the United States illegally by crossing the Rio Grande River on a raft with three other illegally and one guide who gave them instructions to walk towards a fence that was downed and to cross it. He further stated that the guide told the group a white truck was to pick them up. Gonzalez-Gonzalez states that after arriving at the pickup point the group waited for around 5 minutes when a white two door truck arrived. The driver then told them two ride in the front and two in the back. Gonzalez-Gonzalez states that they were in the vehicle for around 10 minutes when the driver saw the police behind him and pulled to the side of the road. Gonzalez-Gonzalez was shown a photo lineup of six individuals and was able to identify Ivan Sanchez-Rodriguez as the driver of the white pick-up truck.